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10 *Attorneys for VPN.COM LLC*

11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA**

13 VPN.COM LLC,

Plaintiff,

14 vs.

15 GEORGE DIKIAN et al.

16 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

17 **STIPULATION AND ORDER TO**
18 **MODIFY SCHEDULING ORDER**

WHEREAS, on February 9, 2023, this Court issued a Scheduling Order (ECF 39);

WHEREAS, the parties jointly request limited modification of certain deadlines in the Scheduling Order as follows:

<u>Deadline</u>	<u>Current</u>	<u>Proposed</u>
Hearing on Motion to Amend Pleadings / Add Parties	05/24/2023	7/28/2023
Non-Expert Discovery Cutoff	07/10/2023	08/04/2023
Expert Disclosure (initial)	06/03/2023	07/03/2023
Expert Disclosure (rebuttal)	07/03/2023	08/03/2023
Expert Discovery Cut-Off	08/03/2023	09/04/2023

;

WHEREAS, good cause exists, as the parties require more time to complete discovery obligations, due to the nature and complexity of the action and discovery, and given certain scheduling conflicts of the parties and counsel as relates to depositions; and

WHEREAS, the limited modifications will not affect the other dates in the Scheduling Order;

IT IS THUS STIPULATED AND AGREED, by and between the parties, through undersigned counsel, that the Scheduling Order is modified to the extent of providing the following new case deadlines:

STIPULATION AND ORDER

<u>Deadline</u>	<u>New Case Date</u>
Hearing on Motion to Amend Pleadings / Add Parties	07/28/2023
Non-Expert Discovery Cutoff	08/04/2023
Expert Disclosure (initial)	07/03/2023
Expert Disclosure (rebuttal)	08/03/2023
Expert Discovery Cut-Off	09/04/2023

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Dated: April 27, 2023 By: /s/ Michael Cilento
 Michael D. Cilento (*proc hac vice*)
 Attorneys for Plaintiff

Dated: April 27, 2023 By: /s/ Mike Rodenbaugh
 Michael L. Rodenbaugh (SBN 179059)
 Attorneys for Defendant Dikian